

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In Re:)
) Case No. 23-10860-cgb
PACKET CONSTRUCTION, LLC,)
)
Debtor.)

**UNITED STATES OF AMERICA'S (SMALL BUSINESS ADMINISTRATION)
LIMITED OBJECTION TO CONFIRMATION OF DEBTOR'S PLAN OF
REORGANIZATION PURSUANT TO 11 U.S. C. § 1190**

The United States of America, Small Business Administration ("SBA"), objects to confirmation of Debtor's Plan of Reorganization (ECF No. 69) for the following reason:

1. The SBA filed a claim in the amount of \$2,104,0359.00. The claim is secured by a blanket lien on all of Debtor's personal property.
2. The Debtor's agreement with the SBA included a personal guarantee for the loaned amounts.
3. The United States objects to the provisions in Debtor's Plan that appear to alter and/or limit that guarantee held by third parties.

Wherefore, the United States prays that Debtor's Plan be denied confirmation.

Respectfully submitted,

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UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I certify that on February 20, 2024, a copy of the foregoing “United States of America’s (Small Business Administration) Limited Objection to Confirmation of Debtor’s Plan of Reorganization Pursuant to 11 U.S.C. § 1190” was served by either the Court’s CM/ECF electronic notification system or by U.S. First Class Mail, postage prepaid, as indicated below:

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